

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Thomas I. Vanaskie
(Ret.), Special Discovery Master

[PROPOSED] ORDER

IT IS HEREBY ORDERED, this ____ day of _____, 2022,
having considered ZHP’s Motion for Leave to File a Sur-Reply Brief to Correct the
Factual Inaccuracies in Plaintiffs’ Reply Brief in Support of Plaintiffs’ Motion for
Sanctions Defendants (“Motion for Leave”), and for good cause shown as follows:

1. ZHP’s Motion for Leave is **GRANTED**; and
2. ZHP’s brief submitted concurrently with the Motion for Leave is
deemed filed.

Hon. Thomas I. Vanaskie (Ret.)
Special Discovery Master